

U.S. Department of Housing and Urban Development

Office of Inspector General 451 7th St, S.W Washington, D.C. 20410

September 15, 2003

Honorable Joseph E. Schmitz Inspector General U.S. **Department** of Defense **400 Army** Navy Drive Arlington, Virginia 22202-2884



Re: Letter of Comments, report on the External Quality Control Review of the Department of Defense's Office of Inspector General's Audit Organization

Dear Mr. Schmitz:

We have reviewed the system of quality control for the audit function of the **Department** of Defense (**DoD**), Office of **Inspector General (OIG)**, in effect for the **year** ended March 31,2003 and have issued our unqualified report thereon dated September **9,2003**. This letter should be read in conjunction with that report.

Our review was for the purpose of reporting whether the OIG's internal quality control was designed in accordance with the quality standards established by the President's Council on Integrity and Efficiency (PCIE) and was being complied with for the year reviewed to provide reasonable assurance of material compliance with professional auditing standards in the conduct of its audits. We conducted our review in conformity with standards and guidelines established by the PCIE. Our review would not necessarily disclose all weaknesses in the system or all instances of noncompliance with it because our review was based on selective tests.

There are inherent limitations that should be recognized in considering the potential effectiveness of any system of quality control. In the performance of most control procedures, departures can result from misunderstanding of the instructions, mistakes of judgment, carelessness, or other personal factors. Projection of any evaluation of a system of quality control to future periods is subject to the risk that one or more procedures may become inadequate because of changes in conditions or that the degree of compliance with procedures may deteriorate.

As a result of our review, we have the following comments, which were considered in determining our opinion set forth in our report dated September 9,2003. This letter does not change that report.

NOTEWORTHY ACCOMPLISHMENTS

Numerous **positive** audit practices were observed about the OIG audit organization. Most importantly, the audit staff showed a high level of professionalism and **expertise**. The audit staff displayed a thorough knowledge during discussions with us concerning the audits we reviewed,

in the final report.

Recommendation:

The Office of Inspector General audit management should take appropriate actions such as conducting training sessions and emphasizing during future internal quality control reviews the areas of (a) timely supervision of audit work and (b) adequate referencing of audit reports.

A copy of your response to the report and letter of comments is provided as an enclosure.

I want to express our appreciation for the cooperation and courtesies extended by your office to the review team. The team received full cooperation from the audit staff.

Sincerely

Kenneth M. Donohue Inspector General

Enclosure

audit procedures and policies, and the audit organization. There **were** noteworthy practices and controls instituted to help ensure audits were performed in accordance with professional standards.

OBSERVATIONS

Timely Supervisory Review of Work

The OIG's policies and procedures require that supervisors be involved and review work on an on-going basis throughout the audit. The working papers must contain documented evidence of supervisory review throughout the project and not just at the project end. We applied a 30-day review period as criteria for determining timeliness of supervisory review. On 4 of the 14 audits reviewed, our review showed workpapers either were not approved, not submitted for review, or reviewed untimely. Details are as follows:

For one audit, our **review** of **142** work papers **disclosed** that 44 of the 142 work papers were **either** (1) not approved, (2) not submitted for review, or (3) reviewed untimely. Five of the 44 work papers had been submitted, but not approved; **20** had not **been** submitted for review; and 19 work papers **were** reviewed untimely.

- On the second audit, we found that 39 of 49 work papers supporting the audit were reviewed untimely. The reviews for the 39 work papers ranged from 35 to 259 days after completion and averaged 173 days. The audit was suspended for a portion of this time. For the third audit with issues involving supervision, we found 46 of 301 work papers were not approved timely.
- On the fourth audit, we found that 21 of 353 work papers were reviewed later than 30 days after the work paper was completed. The time elapsed between the prepared date and the reviewed date for the 21 work papers ranged from 41 to 144 days.

According to the supervisors involved, this occurred **because** either (1) the project manager was reassigned, (2) **workpapers** were not completed, or (3) supervisors **were** involved in other ongoing audits, which delayed their reviews to the end of the audit. Supervisory **review** of working **papers** is an integral part of the internal quality **control** system. Untimely review of working **papers** can result in unnecessary work **completed** by the auditor. When review is delayed until the end of the audit, there is a greater risk that **problems** with the audit work will not be identified until it is too late to **correct**. In addition, incomplete workpapers can result in incomplete **documentation** of the work performed to support **significant** conclusions and judgments.

Reports Were not Adequately Referenced

For every audit, **the OlG's quality** control policies and procedures require the **referencing** of factual data in audit reports to the **supporting** evidence in working papers. To help ensure **the** accuracy of draft and final reports, all statements of fact must be referenced to the supporting evidence in the working papers. Our review showed that 2 of 14 audits had either inaccurate **cross-referencing** of the report to the supporting work papers, factual **information** that was not cross-referenced, or changes **specified** during the independent referencing that were not included



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INSPECTOR GENERAL DEPARTMENT OF DEFENSE 400 ARMY NAVY DRIVE ARLINGTON, VIRGINIA 22202-4704

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Mr. James A. Heist Assistant Inspector General for Audit U.S. Department of Housing and **Urban** Development 451 7th St., S.W. Washington, D.C. 20410

Dear Mr. Heist:

This is in reply to your letter of August 7,2003, which provided the draft opinion and letter of comments from your quality control review of the Office of the Inspector General of the **Department** of Defense.

We appreciate the in-depth review that your **staff** performed on our quality control **function**. The quality of the peer review **team** and their professionalism will help our organization **continue** to improve our quality control program. We also appreciate their **positive comments** on the numerous audit practices that we initiated **during** the past 2 years.

Your observations concerning the supervisory review process and report referencing are **helpful**. Moreover, we concur with your recommendations and plan to revise our training sessions and increase the emphasis of **future** internal quality control reviews to ensure that working **papers** are approved in a timelier manner and more accurately referenced to reports.

If you have any questions on our comments, please contact me or Mr. David A. Brinkman, Director for Audit **Followup** and Technical Support Directorate at **703-604-8905**.

Sincerely,

Francis E. Reardon Deputy Inspector General

for Auditing